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Attorney for Defendant  
SHAHROKH MAJDI

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No.: No. CR-S-04-0130
	)
Plaintiff,	) STIPULATION AND ORDER TO
	) CONTINUE ARRAIGNMENT ON
vs.	) SUPERSEDING INFORMATION;
	) [PROPOSED] ORDER
	)
SHAROKH MAJDI, et al.,	) CURRENT DATE:
	) June 23, 2005, 2:00 PM
Defendant	)
	) PROPOSED NEW DATE:
	) October 20, 2005, 2:00 PM

Defendant, Shahrokh Majdi, through his counsel of record,  
Robert M. Bernstein, and the United States of America, through  
its counsel of record, Assistant United States Attorney, Daniel  
S. Linhardt, hereby stipulate to and request an order to continue  
the date of the arraignment on the superseding Information from  
June 23, 2005, at 2:00 p.m., until October 20, 2005 at 2:00 p.m.

based on the following facts:

1. This case is currently scheduled for arraignment on the  
superseding Information on June 23, 2005, at 2:00 p.m.

2.This superseding Information was filed in anticipation of  
a plea agreement being reached between the parties. However,  
there

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2 will not be a plea agreement and this case will proceed to trial.  
3 Nonetheless, the Defendant will still need to be arraigned on the  
4 superseding Information.

5 3. Both parties agree that the ends of justice are served by  
6 granting this brief continuance. Both parties agree that the  
7 ends of justice served by granting such a continuance outweigh  
8 the best interest of the public and defendant in conducting an  
9 arraignment on June 23, 2005.

10 4. Pursuant to 18 U.S.C. § 3161(h) (8) (A), the ends of  
11 justice served by granting such a continuance outweigh the best  
12 interest of the public and the defendant in conducting an  
13 arraignment on the superseding Information now scheduled for June  
23, 2005.

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2 5. Based on the foregoing, the parties agree that, for the  
3 purpose of computing time under the Speedy Trial Act within which  
4 trial must commence, the time period of June 23, 2005, until  
5 October 20, 2005, constitutes excludable time under the Speedy  
6 Trial Act pursuant to 18 U.S.C. §3161(h)(8)(A).

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8 Dated: June 13, 2005

Respectfully submitted,

9 S/Robert M. Bernstein

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11 ROBERT M. BERNSTEIN  
12 Attorney for Defendant  
13 SHAHROKH MAJDI

14 Dated: June 13, 2005

S/Daniel S. Linhardt

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16 DANIEL S. LINHARDT  
17 ASSISTANT U.S. ATTORNEY  
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ORDER

GOOD CAUSE HAVING BEEN SHOWN: IT IS SO FOUND AND ORDERED:

That the arraignment on the superseding Information currently scheduled for June 23, 2005 at 2:00 P.M. before Magistrate Judge Peter A. Nowinski be continued until October 20, 2005 at 2:00 P.M.

Dated: June 15, 2005.

/s/ Peter A. Nowinski  
PETER A. NOWINSKI  
Magistrate Judge

**PROOF OF SERVICE**  
**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am a resident of the aforesaid County; I am over the age of eighteen years and not a party to the entitled action. My business address is 12400 Wilshire Boulevard, Suite 1500, Los Angeles, California 90025.

On June 13, 2005, I served a copy of the attached **STIPULATION AND ORDER TO CONTINUE ARRAIGNMENT ON SUPERSEDING INFORMATION; [PROPOSED] ORDER**, upon the following parties, such parties being all that are required to be served:

☒ Sent via U.S. Mail :

**DANIEL S. LINHARDT**  
**ASSISTANT U.S. ATTORNEY**  
**591 I STREET, SUITE 10-100**  
**SACRAMENTO, CA 95814**  
**Fax: (916) 554-2900**

I declare under the penalty of perjury under the laws of the State of California that the forgoing is true and correct to the best of my knowledge and belief.

Executed on June 13, 2005, at Los Angeles, California.

\_\_\_\_\_  
Amir Aharonov